

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**TEAL PEAK CAPITAL, LLC;**

Plaintiff,

v.

**ALAN BRAM GOLDMAN;**

Defendants.

Civil No. 3:20-cv-01747 (PAD)

**BREACH OF CONTRACT; SPECIFIC  
PERFORMANCE OF CONTRACT;  
REIMBURSEMENT OF FUNDS,  
COSTS AND EXPENSES**

**MOTION TO WITHDRAW AS ATTORNEY**

**TO THE HONORABLE COURT:**

**COMES NOW**, Plaintiff **Teal Peak Capital, LLC** ("TPC" and/or "Plaintiff") through the undersigned attorney, and respectfully alleges, states, and prays as follows:

1. On April 13, 2021, Defendant filed a Motion to Disqualify (Docket No. 24) wherein Defendant misconstrues his prior relationship with his former law firm and the subject matter at hand.

2. To wit, whatever work was done for the Defendant concerning disputes with his homeowner association has nothing to do with the enforcement of an option agreement for which the attorneys took no part or consideration in whatever purchase price negotiations TPC or third parties had with the Defendant. The "critical information" Defendant claims were put in TPC's "hands" is news to the undersigned, and entirely irrelevant to the case at hand.

3. That said, Defendant's motion is precisely the type of procedural move that counts on the opposing party spending all of their time refuting, rather than moving the case itself forward. As such, the undersigned can either refute the ill-informed motion to disqualify and delay the case, or withdraw from legal representation, and allow the case to move swiftly for resolution.

4. Accordingly, the undersigned has discussed with TPC and TPC has accepted the undersigned petition to withdraw as legal counsel for this matter, for which, in accordance with Local Rule 83(b), the undersigned seeks leave to withdraw as legal counsel for this matter.

5. TPC has already retained new legal counsel for this matter, and the undersigned has already discussed with TPC all matters concerning the present withdrawal as well as delivered copies of all pertinent legal documents to TPC's new counsel.

6. The undersigned's withdraw is not made because of the claims (which we deny) made by the Defendant, but rather because the best interest of TPC lie in moving this case as quick as possible, and not in delaying the same due to any issue not directly relating to the claims at hand.

**WHEREFORE**, TPC respectfully requests this Honorable Court to grant the motion and consequently allow for the undersign to withdraw as legal representation to TPC.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 21<sup>st</sup> day of April, 2021.

**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall notify all counsels of record.

**Ferraiuoli** LLC

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**/s/ Jean G. Vidal-Font**

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